

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

OPENAI, INC., COPYRIGHT
INFRINGEMENT LITIGATION

This Document Relates To:

Case No. 1:23-cv-08292

Case No. 1:23-cv-10211

Case No. 1:25-cv-03482

Case No. 1:25-cv-03483

Case No. 1:25-cv-03291

1:25-md-03143-SHS/OTW

**NOTICE OF APPLICATION TO
APPOINT RACHEL GEMAN AS
INTERIM LEAD COUNSEL FOR
THE CLASS PLAINTIFFS**

PLEASE TAKE NOTICE that Rachel Geman of Lieff Cabraser Heimann & Bernstein, LLP, will move this Court before the Honorable Sidney H. Stein, United States District Judge, at the United States District Court for the Southern District of New York, 40 Foley Square, New York, NY 10007, for an order appointing Rachel Geman, Lieff Cabraser Heimann & Bernstein, LLP as interim lead class counsel for all classes in the following actions:

- Case No. 1:23-cv-08292
- Case No. 1:23-cv-10211
- Case No. 1:25-cv-03482
- Case No. 1:25-cv-03483
- Case No. 1:25-cv-03291

A proposed order is attached to this notice and will be submitted to the Orders Clerk concurrently with this filing.

In support of the application, Lieff Cabraser will rely upon the accompanying memorandum of law, the Declaration of Rachel Geman, and any other written or oral argument as may be requested or permitted by the Court.

Dated: May 28, 2025

LIEFF CABRASER HEIMANN
& BERNSTEIN, LLP

/s/ Rachel Geman

Rachel Geman
250 Hudson Street, 8th Floor
New York, NY 10013-1413
Telephone: 212.355.9500
rgeman@lchb.com

Attorney for Authors Guild and
Alter Class Plaintiffs